

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

A.A.R.P., *et al.*,

Petitioners–Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No. 1:25-cv-59-H

**UNOPPOSED MOTION FOR LEAVE TO FILE AMENDED CLASS PETITION FOR
WRIT OF HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF AND AMENDED CLASS CERTIFICATION MOTION**

Plaintiffs-Petitioners (“Petitioners”) respectfully submit this motion to file an Amended Class Petition for Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief and an amended class certification motion and accompanying memorandum of law. The proposed amended pleadings have been contemporaneously filed with this motion, as a proposed order. The government consents to filing amended versions of both pleadings. Pursuant to Federal Rule of Civil Procedure 15(a)(1)(A), Petitioners may file the amended pleadings as of right, and seek leave to do so if leave is necessary.

Dated: April 18, 2025

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Respectfully submitted,

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**Pro hac vice applications
forthcoming*